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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

JEFF HATCH-MILLER, CHAIRMAN
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

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AZ CORP COMMISSION
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IN THE MATTER OF THE COMPLAINT OF THE
BUREAU OF INDIAN AFFAIRS, UNITED STATES
OF AMERICA, AGAINST THE MOHAVE
ELECTRIC COOPERATIVE, INC. AS TO
SERVICES TO THE HAVASUPAI AND HUALAPAI
INDIAN RESERVATIONS.

DOCKET NO. E-01750A -05-0579

MOTION TO EXTEND ANSWER
DEADLINE AND MOTION TO
EXPEDITE RULING

Respondent Mohave Electric Cooperative, Inc. ("Mohave"), by and through its legal counsel undersigned, moves this Commission to extend the filing deadline for Mohave's answer to BIA's Complaint. Mohave previously filed a Motion to Extend the Filing Deadline for a responsive pleading, to which BIA had acquiesced. However, in the Procedural Order, the ALJ ordered:

"IT IS THEREFORE ORDERED that the deadline for the filing of an Answer to the above-captioned Complaint is hereby extended to September 19, 2005."

Because of Labor Day vacations and the difficulty Mohave's legal counsel has had in communicating with members of Mohave's management and staff for the preparation of an answer, Mohave respectfully requests an extension of the September 19, 2005 deadline of Mohave's answer until ten (10) days after a ruling on Mohave's Motion to Dismiss, which Mohave anticipates shall be filed on or before September 19, 2005. This Motion is submitted and filed in an abundance of caution. It may have been the intent of the ALJ to require the filing of any responsive pleading by

1 September 19, 2005. Accordingly, this Motion is also filed for the purpose of clarification on
2 whether any responsive pleading will suffice as a filing on September 19, 2005.

3 Dated this 13th day of September, 2005.

4 CURTIS, GOODWIN, SULLIVAN,
5 UDALL & SCHWAB, P.L.C.

6
7 By: 
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11 Original and thirteen (13) copies of
12 the foregoing filed this 13th day of September, 2005 with:

13 Docket Control Division
14 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
15 Phoenix, Arizona 85007

16 Copies of the foregoing hand delivered/mailed
this 13th day of September, 2005 to:

17 JEFF HATCH-MILLER, CHAIRMAN
18 COMMISSIONER WILLIAM A. MUNDELL
19 COMMISSIONER MARC SPITZER
20 COMMISSIONER MIKE GLEASON
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12 _____
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